### IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA, SOUTHERN DIVISION

DARRYL ANDERSON, et al.,	§	
	§	
Plaintiffs,	§	
	§	CIVIL ACTION NO.
v.	§	1:06-cv-1000-MEF
	§	
PERDUE FARMS, LLC.	§	
	§	
	§	
Defendant.	§	

#### **NOTICE OF FILING ADDITIONAL CONSENTS TO JOIN**

Plaintiff hereby files the following Notices of Consent in connection with the above-titled and numbered actions, attached hereto:

- 1. Joyce Dawson
- 2. Alisha Pollard
- 3. Rhonda M. Harris
- 4. Britney J. Weems
- 5. Takeisha Vashay Johnson
- 6. Whitney Webb
- 7. Patricia A. Smith
- 8. Edwin Flowers
- 9. Kevin Acree
- 10. Shawanda Robinson
- 11. Cord Jenkins

Dated: June 27, 2008 Respectfully submitted,

THE COCHRAN FIRM, P.C.

/s/ Robert J. Camp

**ROBERT J. CAMP** 

#### **BERNARD D. NOMBERG**

505 North 20<sup>th</sup> Street, Suite 825 Birmingham, AL 35203 (205) 930-6900 (Phone) (205) 930-6910 (Fax)

– and –

Samuel A. Cherry, Jr. Lance H. Swanner THE COCHRAN FIRM, P.C. 163 West Main Street P. O. Box 927 Dothan, AL 36302 (334) 793-1555 (Phone) (334) 793-8280 (Fax)

### **CERTIFICATE OF SERVICE**

I hereby certify that on <u>June 27, 2008</u> I electronically filed the above Notice with the Clerk of the District Court using CM/ECF System, which sent notification of such filing to:

Samuel A. Cherry Attorney for Plaintiff scherry@cochranfirm.com

Lance Harrison Swanner
Attorney for Plaintiff
lswanner@cochranfirm.com

Bernard D. Nomberg Attorney for Plaintiff bnomberg@cochranfirm.com

Robert J. Camp Attorney for Plaintiff rcamp@cochranfirm.com

James Kelley Attorney for Defendant <u>jkelley@morganlewis.com</u>

Sandra Reiss Attorney for Defendant Sandra.reiss@odnss.com

Richard B. Celler Attorney for Plaintiff Richard@cellarlegal.com

/s/ Robert J. Camp\_

ROBERT J. CAMP

TO:	CLERK OF THE COURT AND COUNSEL OF RECORD
Joy	ger Dawsof states the following: [Print Name]
1.	I am over 18 years of age and competent to give the following consent in this matter.
2.	I am currently, or was formerly, employed by Perdue Farms
	at the facility located in Dothan, Alabama. I worked at this
	location from 4-0/ to 4-05 [Date, or if still working write "present"]
<b>3.</b>	I understand that this suit is being brought against Perdue Farms, LLC to recover unpaid compensation and overtime for violations of the Fair Labor Standards Act. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4.	I believe that I have not been paid for all compensable time which I have worked, including overtime.
5.	I hereby consent and agree to be a plaintiff in this lawsuit and to be bound by any decision in this lawsuit or by any settlement of this case.
	I understand that this suit may be brought as a collective action covering byees of Defendant. If brought as a collective action under either federal or state consent to join as a plaintiff in such suit.
know	I swear or affirm that the foregoing Statements are true to the best of my ledge.
	DATED the / / day of JUNE, 2008
U01/ [PRIN	TE DOWSON  ST NAME]  Ma:/ To:  SIGN NAME]  OLYMB:a, Ala. 36319  IT STREET ADDRESS]  [PRINT CITY, STATE, ZIP CODE]
F	
(PRIN	19-349-317/ IT CELL PHONE NUMBER] [PRINT HOME PHONE NUMBER]

TO:	CLERK OF THE COURT AND COUNSEL OF RECORD
Ali	states the following: [Print Name]
1.	I am over 18 years of age and competent to give the following consent in this matter.
2.	I am currently, or was formerly, employed by Pordox Forms
	at the facility located in Dothan, Alabama. I worked at this
	location from 10-03+07-06 to D-04+01-07 [Date] to [Date, or if still working write "present"]
3.	I understand that this suit is being brought against Perdue Farms, LLC to recover unpaid compensation and overtime for violations of the Fair Labor Standards Act. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4.	I believe that I have not been paid for all compensable time which I have worked, including overtime.
5.	I hereby consent and agree to be a plaintiff in this lawsuit and to be bound by any decision in this lawsuit or by any settlement of this case.
emplo law, I	I understand that this suit may be brought as a collective action covering byees of Defendant. If brought as a collective action under either federal or state consent to join as a plaintiff in such suit.
know	I swear or affirm that the foregoing Statements are true to the best of my ledge.
	DATED the haday of June, 2008
PRIN	Sha Pollard : Alisla Pollard (SIGN NAME)
[PRIN	Rethony Formstum Corrollton Go 30116 [PRINT CITY, STATE, ZIP CODE]
<u>2</u> [PRIN	178-60-364 IT CELL PHONE NUMBER] [PRINT HOME PHONE NUMBER]

	CONSENT TO JOIN SUI	ASTARTIT
TO:	CLERK OF THE COURT AND COU	NSEL OF RECORD
B	nonda M. Harrisstates the fi	ollowing:
1.	I am over 18 years of age and compet	ent to give the following consent in this
2.	I am currently, or was formerly, emp	oyed by Perdue Farm, Inc.  [Employer]  [Employer]
	at the facility located in Dothan, Alac	allia. I Worked at all
	location from $2 - \frac{12000}{\text{[Date]}}$	to 10/2007 [Date, or if still working write "present"]
3.	unpaid compensation and overtime if I understand that the suit is brought parties state statutes, if any.	ought against Perdue Farms, LLC to recover or violations of the Fair Labor Standards Act. oursuant to both federal law and applicable
4.	I believe that I have not been paid for including overtime.	or all compensable time which I have worked,
5.	I hereby consent and agree to be a p decision in this lawsuit or by any se	laintiff in this lawsuit and to be bound by any ttlement of this case.
emp law,	I understand that this suit may be br ployees of Defendant. If brought as a c y, I consent to join as a plaintiff in such	ought as a collective action covering ollective action under either federal or state suit.
kno	I swear or affirm that the foregoing owledge.	Statements are true to the best of my
	DATED the day of	<u>ne</u> , 2008
<u>R</u> [PR	RINT NAME]	Phonda M. Harris SIGN NAME]
<u>] (</u> [PR	072 Fir Street RINT STREET ADDRESS]	Dothan, Ola, 36303 PRINT CITY, STATE, ZIP CODE]
<u> </u>	RINT CELL PHONE NUMBER]	(334) 671–8819 [PRINT HOME PHONE NUMBER]

TO:	CLERK OF THE COURT AND COUNSEL OF RECORD
BRIT	TNEY J. WEEMS states the following: [Print Name]
1.	I am over 18 years of age and competent to give the following consent in this matter.
2.	I am currently, or was formerly, employed byfELOUE
	at the facility located in Dothan, Alabama. I worked at this
	location from 2/04 to U05 [Date] [Date, or if still working write "present"]
3.	I understand that this suit is being brought against Perdue Farms, LLC to recover unpaid compensation and overtime for violations of the Fair Labor Standards Act. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4.	I believe that I have not been paid for all compensable time which I have worked, including overtime.
<b>5.</b> ·	I hereby consent and agree to be a plaintiff in this lawsuit and to be bound by any decision in this lawsuit or by any settlement of this case.
employ	I understand that this suit may be brought as a collective action covering yees of Defendant. If brought as a collective action under either federal or state consent to join as a plaintiff in such suit.
knowle	I swear or affirm that the foregoing Statements are true to the best of my edge.
	DATED the $\underline{pq}$ day of $\underline{JuNE}$ , 2008
BRITT [PRINT	NEY J. WEEMS [SIGN NAME]
249 [PRINT	TSTREET ADDRESS] [PRINT CITY, STATE, ZIP CODE]
(334) (PRINI	(334) 712-199U [PRINT HOME PHONE NUMBER]

TO:	CLERK OF THE COURT AND COUNSEL OF RECORD
Takeis	ha Va Shay Johnson states the following:
	[Print Name] \(\frac{1}{2}\)
1.	I am over 18 years of age and competent to give the following consent in this matter.
	I am currently, or was formerly, employed by <u>Farms</u> [Employer]
2.	
	at the facility located in Dothan, Alabama. I worked at this
	location from February 27, 2006 to March 17, 2006. [Date, or if still working write "present"]
3.	I understand that this suit is being brought against Perdue Farms, LLC to recover unpaid compensation and overtime for violations of the Fair Labor Standards Act. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4.	I believe that I have not been paid for all compensable time which I have worked, including overtime.
5.	I hereby consent and agree to be a plaintiff in this lawsuit and to be bound by any decision in this lawsuit or by any settlement of this case.
empl	I understand that this suit may be brought as a collective action covering oyees of Defendant. If brought as a collective action under either federal or state I consent to join as a plaintiff in such suit.
	To the the ferror in a Statements are true to the best of my
know	I swear or affirm that the foregoing Statements are true to the best of my rledge.
	DATED the At day of June, 2008
Take	isha V. Johnson Jakaisha V. Johnson [SIGN NAME]
021 <u>21</u> [PRI	Othan Rd. Apt. [D]  NT STREET ADDRESS]  Aboville, AL 36310-2942  [PRINT CITY, STATE, ZIP CODE]
33 <u>/</u>	NT CELL PHONE NUMBER] [PRINT HOME PHONE NUMBER]

TO:	CLERK OF THE COURT AND	COUNSEL OF RECORD
Mh	itney Webb states [Print Name]	the following:
1.	I am over 18 years of age and commatter.	mpetent to give the following consent in this
2.	I am currently, or was formerly, or at the facility located in Dothan,	employed by <u>Perdue Farms</u> [Employer]  Alabama. I worked at this
	location from 1-17-07 [Date]	to 12-3-07 [Date, or if still working write "present"]
3.	unpaid compensation and overting	g brought against Perdue Farms, LLC to recover ne for violations of the Fair Labor Standards Act the pursuant to both federal law and applicable
4.	I believe that I have not been paincluding overtime.	d for all compensable time which I have worked
5.	I hereby consent and agree to be decision in this lawsuit or by any	a plaintiff in this lawsuit and to be bound by any settlement of this case.
	I understand that this suit may be byees of Defendant. If brought as I consent to join as a plaintiff in su	e brought as a collective action covering a collective action under either federal or state ch suit.
know	I swear or affirm that the foregoi ledge.	ng Statements are true to the best of my
	DATED the \\S+\(\)_ day of \(\sum_{\lambda}\)	<u>ne</u> , 2008
Whi [PRII	tney Webb NT NAME]	Whitney webb [SIGN NAME]
<u>løl</u> [PRII	T STREET ADDRESS]	Blowely GA, 39823 [PRINT CITY, STATE, ZIP CODE]
<u> </u>	- 254-1463 NT CELL PHONE NUMBER]	220-723-5065 [PRINT HOME PHONE NUMBER]

TO:	CLERK	COF	THE COUR	T AND COUNSEL OF RECO	RD
Pati	TC/A		Smith.	states the following:	

- 1. I am over 18 years of age and competent to give the following consent in this matter.
- 2. I am currently, or was formerly, employed by <u>Ferdue Farms</u>

  [Employer]

  at the facility located in Dothan, Alabama. I worked at this

  location from <u>Tune 15, 2001</u> to <u>Present</u>

  [Date] to <u>Present</u>

  [Date, or if still working write "present"]
- 3. I understand that this suit is being brought against Perdue Farms, LLC to recover unpaid compensation and overtime for violations of the Fair Labor Standards Act. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
- 4. I believe that I have not been paid for all compensable time which I have worked, including overtime.
- 5. I hereby consent and agree to be a plaintiff in this lawsuit and to be bound by any decision in this lawsuit or by any settlement of this case.

I understand that this suit may be brought as a collective action covering employees of Defendant. If brought as a collective action under either federal or state law, I consent to join as a plaintiff in such suit.

I swear or affirm that the foregoing Statements are true to the best of my knowledge.

DATED the 18 day of 2	June, 2008
<u>Patricia A. Smith</u>	Patrica A Smila
[PRINT NAME]	[SIGN NAME]
1203 old Columbia Rol	Blakely GA 39823
[PRINT STREET ADDRESS]	[PRINT CITY, STATE, ZIP CODE]
[PRINT CELL PHONE NUMBER]	(229) 723 - 6461 [PRINT HOME PHONE NUMBER]

TO:	CLERK OF THE COURT AND	COUNSEL	OF RECORD
Ec	Verint Name] states	the followin	g:
1;	I am over 18 years of age and cormatter.	mpetant to g	ive the following consent in this
2.	I am currently, or was formerly, e	employed by	Pardue
	at the facility located in Dothan A		
	location from	to _	[Date, or if still working write "present]
3.	unpaid compensation and overting	ne for violati	ainst Perdue Farms, LLC to recover ions of the Fair Labor Standards Act to both federal law and applicable
4.	I believe I have not been paid for including overtime.	all compens	sable time which I have worked,
5.	I hereby consent and agree to be decision in this lawsuit or by any	-	this lawsuit and to be bound by any of this case.
-	I understand that this suit may be byees of Defendant. If brought as a consent to join as a plaintiff in such	a collective	<del>-</del>
know	I swear or affirm that the foregoing ledge.	ng Statemen	ts are true to the best of my
	DATED the day of	24	, 2007
Eda) [PRIN	T NAME]	[SIGN NA	ME]
//0 / [PRIN	<i>SCOTGE GOOK DIVC</i> NT STREET ADDRESS]	Ashford [PRINT C	Al. 363/2 ITY, STATE, ZIP CODE]
<b>79</b> 7	7 - 453   NT CELL PHONE NUMBER]		-/323 OME PHONE NUMBER]

Bevin Acree states the following:	TO: CLE	RK OF THE COUF	RT AND COUNSEL OF	RECORD
[Print Name]	Bevin Print N	Acres	_ states the following:	

- 1. I am over 18 years of age and competent to give the following consent in this matter.
- 2. I am currently, or was formerly, employed by Perdue TOYMS

  [Employer]

  at the facility located in Dothan, Alabama. I worked at this

  location from Dothan, Mesel to [Date, or if still working write "present"]
- 3. I understand that this suit is being brought against Perdue Farms, LLC to recover unpaid compensation and overtime for violations of the Fair Labor Standards Act. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
- 4. I believe that I have not been paid for all compensable time which I have worked, including overtime.
- 5. I hereby consent and agree to be a plaintiff in this lawsuit and to be bound by any decision in this lawsuit or by any settlement of this case.

I understand that this suit may be brought as a collective action covering employees of Defendant. If brought as a collective action under either federal or state law, I consent to join as a plaintiff in such suit.

I swear or affirm that the foregoing Statements are true to the best of my knowledge.

	DATED the day of	June, 2008
	Kern acres	Bu A
Lot	[PRINT NAME]  1322  1118 East Sanduars	[SIGN NAME]  Dothan Al 32303
	[PRINT STREET ADDRESS]  (33/) 389-1193  PRINT CELL PHONE NUMBER]	[PRINT CITY, STATE, ZIP CODE]  [PRINT HOME PHONE NUMBER]

TO:	CLERK OF THE COURT AND COUNSEL OF RECORD		
She	Print Name] states the following:		
1.	I am over 18 years of age and competent to give the following consent in this matter.		
2.	I am currently, or was formerly, employed by Perdue		
	at the facility located in Dothan, Alabama. I worked at this		
	location from to [Date] [Date, or if still working write "present"]		
3.	I understand that this suit is being brought against Perdue Farms, LLC to recover unpaid compensation and overtime for violations of the Fair Labor Standards Act I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.		
4.	I believe that I have not been paid for all compensable time which I have worked including overtime.		
5.	I hereby consent and agree to be a plaintiff in this lawsuit and to be bound by an decision in this lawsuit or by any settlement of this case.		
I understand that this suit may be brought as a collective action covering employees of Defendant. If brought as a collective action under either federal or state law, I consent to join as a plaintiff in such suit.			
I swear or affirm that the foregoing Statements are true to the best of my knowledge.			
	DATED the 16 day of June, 2008		
Sh [PRIN	Mana & Robinson (SIGN NAME)		
P. [PRIN	T STREET ADDRESS]  [PRINT CITY, STATE, ZIP CODE]		
	9-308-4573 219-835-2684 [PRINT HOME PHONE NUMBER]		

The second secon

TO:	CLERK OF THE COURT AND C	OUNSEL OF RECORD	
COR	D TENKINS states the [Print Name]	e following:	
1.		petent to give the following consent in this	
2.	I am currently, or was formerly, employed by PERDUE, DOTHAU		
	at the facility located in Dothan, A	labama. I worked at this	
3.	I understand that this suit is being unnaid compensation and overtime	to  [Date, or if still working write "present"]  and who when the object of the Farms, LLC to recover the for violations of the Fair Labor Standards Act the pursuant to both federal law and applicable	
4.	I believe that I have not been paid for all compensable time which I have worked including overtime.		
5.	I hereby consent and agree to be a plaintiff in this lawsuit and to be bound by any decision in this lawsuit or by any settlement of this case.		
err lav	I understand that this suit may be brought as a collective action covering ees of Defendant. If brought as a collective action under either federal or state consent to join as a plaintiff in such suit.		
knov	I swear or affirm that the foregoin vledge.	g Statements are true to the best of my	
	DATED the le day of Au	JUE	
	LD JENKINS -152-62-6477 NT NAME]	Cordentius [SIGN NAME]	
	OZARL PO NT STREET ADDRESS]	NEWVILE ALY 36353 [PRINT CITY, STATE, ZIP CODE]	
334) 441 - 8535 334 (889 - 4620 [PRINT CELL PHONE NUMBER]			